

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

EARNEST SHIELDS,)
)
Plaintiff,)
)
v.) Case No. 10 CV 3746
)
ILLINOIS DEPT. OF CORRECTIONS, et al.,)
)
Defendants.)

**AGREED MOTION TO REVISE BRIEFING SCHEDULE
ON PLAINTIFF'S MOTION TO RECONSIDER**

NOW COMES Plaintiff, Earnest Shields, by and through his attorney, James A. Karamanis of Barney & Karamanis, LLP, and, all parties being in agreement, respectfully requests that this Honorable Court revise the briefing schedule with respect to Plaintiff's Motion for Relief from Memorandum Opinion and Order Granting Defendants' Motion for Summary Judgment. In support of his Motion, Plaintiff states as follows:

1. That on July 26, 2012, Plaintiff filed his Motion for Relief from Memorandum Opinion and Order Granting Defendants' Motion for Summary Judgment (hereinafter "Motion for Relief").
2. That this Court ordered that Plaintiff's Memorandum in Support of his Motion for Relief (hereinafter the "Memorandum") be filed by August 27, 2012.
3. That due to exigent circumstances, multiple depositions, and four (4) responses due in other litigation cases over the previous weeks, Plaintiff's counsel has been unable to finalize the Memorandum.

4. That the parties have agreed to the following revised briefing schedule, subject to Court approval:

- a. Plaintiff to file Memorandum in Support on or before August 31, 2012;
- b. Defendants to file their Response on or before September 21, 2012; and
- c. Plaintiff to file his Reply on or before October 8, 2012.

5. That no party will be prejudiced by the granting of this Motion; however, Plaintiff's case will be severely prejudiced should the Court not grant the relief requested.

5. That all parties are in agreement with this Motion.

WHEREFORE, Plaintiff, Earnest Shields, prays that this Honorable Court revise the briefing schedule to allow Plaintiff until August 31, 2012, to file his Memorandum, allow Defendants until September 21, 2012, to file their Responses, allow Plaintiff until October 8, 2012, to file his Reply, and for any further and additional relief for Plaintiff this Court deems just and fair.

/s/James A. Karamanis

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